

1 The Honorable James L. Robart  
2 Trial Date: March 9, 2020  
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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON AT SEATTLE  
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12 NAXOS, LLC, d/b/a Spiros Greek  
13 Restaurant,

14 Plaintiff,

15 vs.

16 AMERICAN FAMILY INSURANCE  
17 COMPANY, a foreign insurer,

18 Defendant.

19 Case No. 18-CV-01287 JLR  
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22 **STIPULATED MOTION FOR RELIEF  
23 FROM DISCOVERY DEADLINE**

24 NOTED ON MOTION CALENDAR:  
25 NOVEMBER 7, 2019

26 Pursuant to LCR 7(j) and 10(g), the parties hereby stipulate and jointly request that this  
27 Court continue the deadline to complete discovery by six (6) more days from November 19,  
28 2019 to November 25, 2019, for the purposes of completing two (2) additional depositions.

29 Counsel for the parties have conferred and have undertaken substantial efforts to  
30 schedule all depositions prior to the discovery deadline. The parties agreed that relief from the  
31 discovery deadline for completion of these two additional depositions is warranted.

32 The parties propose scheduling depositions as follows:

33 November 20, 2019; Trina Loukas, Naxos Fed. R. Civ. P. 30(b)(6) corporate designee.

34 November 25, 2019; John Loukas, fact witness.

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36 Case No. 18-CV-01287 JLR  
37 **STIPULATED MOTION FOR RELIEF FROM  
38 DISCOVERY DEADLINE - 1**

39 COLE | WATHEN | LEID | HALL, P.C.  
40 1505 WESTLAKE AVENUE NORTH, SUITE 700  
41 SEATTLE, WASHINGTON 98109-6243  
42 (206) 622-0494/FAX (206) 587-2476

1 IT SO STIPULATED

2 DATED this 7<sup>th</sup> day of November, 2019.

3 **COLE | WATHEN | LEID | HALL, P.C.**

4 *s/ Jeremy L. Muth*

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Rory W. Leid, III, WSBA #25075  
6 Jeremy L. Muth, WSBA #52055  
7 *Attorneys for Defendant*  
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12 DATED this 7<sup>th</sup> day of November, 2019.

13 **LETHER & ASSOCIATES, PLLC**

14 *s/ Eric Neal with email permission*

15 Thomas Lether, WSBA #18089  
16 Eric Neal, WSBA #31863  
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21 DATED this 7<sup>th</sup> day of November, 2019.

22 **KELLER ROHRBACK L.L.P.**

23 *s/ Jeff N. Comstock with email permission*

24 William C. Smart, WSBA #8192  
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## ORDER

PURSUANT TO THE PARTIES' STIPULATION, IT IS HERBY ORDERED:

1. The parties; Stipulated Motion for Relief from discovery Deadline is HEREBY GRANTED.
2. The parties may conduct depositions as proposed above.
3. All other deadlines remain in place.

DATED this 8 day of November, 2019.

JAMES L. ROBART  
United States District Judge

## **CERTIFICATE OF SERVICE**

2 The undersigned makes the following declaration certified to be true under penalty of  
3 perjury pursuant to RCW 9A.72.085:

4 On the date given below, I hereby certify that I caused the foregoing to be filed using  
5 the United States District Court for Western District of Washington – Document Filing System  
(CM/ECF) which will also send notification to the following:

<p><b><u>Counsel for Plaintiff:</u></b></p> <p>Eric Neal, WSBA #31863      Chance Laboda, WSBA #54273      Jenna Mark, WSBA #54366      Thomas Oster, WSBA #52880      LETHER &amp; ASSOCIATES, PLLC      1848 Westlake Avenue N., Suite 100      Seattle, WA 98109      206-467-5444  <u><a href="mailto:eneal@letherlaw.com">eneal@letherlaw.com</a></u>  <u><a href="mailto:claboda@letherlaw.com">claboda@letherlaw.com</a></u>  <u><a href="mailto:jmark@letherlaw.com">jmark@letherlaw.com</a></u>  <u><a href="mailto:toster@letherlaw.com">toster@letherlaw.com</a></u>  <u><a href="mailto:ateretchenko@letherlaw.com">ateretchenko@letherlaw.com</a></u></p>	<p><b>Via Email/E-Service</b></p>
<p><b><u>Co-Counsel Plaintiff:</u></b></p> <p>William C. Smart, WSBA #8192      Ian S. Birk, WSBA #31431      Nathan L. Nanfelt, WSBA #45273      1201 Third Avenue, Ste. 3200      Seattle, WA 98101      206-623-1900  <u><a href="mailto:wsmart@kellerrohrback.com">wsmart@kellerrohrback.com</a></u>  <u><a href="mailto:ibirk@kellerrohrback.com">ibirk@kellerrohrback.com</a></u>  <u><a href="mailto:nnanfelt@kellerrohrback.com">nnanfelt@kellerrohrback.com</a></u></p>	<p><b>Via Email/E-Service</b></p>

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 7<sup>th</sup> day of November, 2019, at Seattle, Washington.

s/ Jodi Graham  
Jodi Graham, Legal Assistant  
jgraham@cwlhlaw.com

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